

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

IN RE WILMINGTON TRUST)	
SECURITIES LITIGATION)	Master Civ. No. 10-990-SLR-SRF
)	(Consolidated Securities Class Action)
)	

**UNOPPOSED MOTION OF UNITED STATES OF AMERICA TO
INTERVENE AND MOTION FOR A LIMITED STAY OF DISCOVERY**

Now Comes the United States of America, by and through its undersigned counsel, and respectfully moves (1) to intervene in the above-captioned matter pursuant to Rule 24 of the Federal Rules of Civil Procedure and (2) for a limited stay of fact depositions, interrogatories, and requests for admissions relating to items 3(a)(1)-(4) of the Joint Rule 26(f) Scheduling Order (D.I. 240) through March 1, 2015.

For the reasons set forth more fully in the accompanying memorandum of law and *Ex Parte* Affidavit, the United States respectfully requests the Court to grant its motion to intervene and for a limited stay of discovery. A proposed order is attached.

Respectfully Submitted,
CHARLES M. OBERLY, III
United States Attorney
District of Delaware

/s/

Robert F. Kravetz, Esq.
Lesley F. Wolf, Esq.
Assistant United States Attorneys

WILLIAM STELLMACH
Chief, Fraud Section, Criminal Division
United States Department of Justice

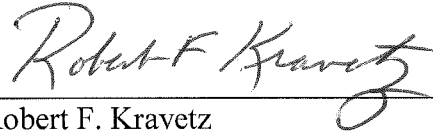
/s/

Brent Wible, Esq., Assistant Chief
William Johnston, Trial Attorney

October 10, 2014

CERTIFICATION PURSUANT TO LOCAL RULE 7.1.1

Pursuant to Local Rule 7.1.1, Intervenor, the United States of America, has consulted with counsel for the Plaintiffs and Defendants. All parties consent to the United States' Motion to Intervene. Counsel for all Defendants also consents to the United States' Motion for a Limited Stay of Discovery. Counsel for Plaintiffs opposes the Motion for a Limited Stay of Discovery.

A handwritten signature in cursive script, reading "Robert F. Kravetz", is positioned above a horizontal line.

Robert F. Kravetz
Assistant U.S. Attorney
District of Delaware

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ORDER

AND NOW, this ____ day of _____, 2014, upon
consideration of Intervenor United States of America's Unopposed Motion to Intervene and
Motion for a Limited Stay of Discovery, IT IS HEREBY ORDERED that:

1. The Unopposed Motion to Intervene under Federal Rule of Civil Procedure 24 is GRANTED.
2. The Motion for a Limited Stay of Discovery is GRANTED. The following fact discovery is stayed through March 1, 2015:

All fact depositions, interrogatories, and requests for admission relating to items 3(a)(1)-(4) of the Joint Rule 26(f) Scheduling Order (D.I. 240).

By the Court: _____

Hon. Sue L. Robinson
United States District Judge